

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

**DENISE WHITE and  
MARK RANDALL DRAPER,**

**Plaintiffs**

**v.**

**JEREMY D. CURLEY,**

**OFFICER WALTER M. LOVEY,**

**KANSAS CITY BOARD OF POLICE  
COMMISSIONERS,**

**DOWNTOWN KANSAS CITY  
COMMUNITY IMPROVEMENT  
DISTRICT,**

**THE DOWNTOWN COUNCIL d/b/a THE  
DOWNTOWN COUNCIL OF KANAS CITY,**

**and**

**UNITED AMERICAN SECURITY, LLC,**

**Defendants.**

**Case No. 4:21-cv-00404**

**JURY TRIAL DEMANDED**

**JUDGMENT AND ORDER APPROVING PARTIAL SETTLEMENT**

This matter is before the Court on the Plaintiffs' Application for Approval of Partial Settlement Regarding Wrongful Death Claims (Doc. No. 49). Said Application being presented and the Court being duly advised in the premises, the Court does hereby make the following findings:

1. Robert Allen White died on June 14, 2018.
2. Robert Allen White was survived by his biological mother (Denise White) and his biological father (Mark Randall Draper), the two named plaintiffs in this action.

3. No one else is entitled by Missouri law to make a claim for the death of Robert Allen White.

4. Plaintiffs have made claims against defendants regarding the wrongful death of their son. Two of those defendants have settled the claims made against them by the proposed payment of money in settlement of the claims against those two defendants. Plaintiffs will dismiss with prejudice the claims originally made against those two original defendants, specifically defendants Downtown Kansas City Community Improvement District, and The Downtown Council d/b/a The Downtown Council of Kansas City. All other claims remain pending and are going forward.

5. Plaintiff Denise White employed William Denning as her attorney in this action, and plaintiff Mark Randall Draper employed John Kurtz as his attorney to assist in taking forward the above-captioned cause of action. Said attorneys have advised plaintiffs as to this **PARTIAL** settlement, and they acknowledge that it is a full settlement against the two identified defendants.

6. Plaintiffs are requesting the Court to approve the **PARTIAL** settlement of the overall case which is delineated in other confidential filings.

7. Plaintiffs and their attorneys believe and have represented to the Court that the **PARTIAL** settlement of plaintiffs' claims is fair and reasonable, considering all the facts and circumstances. The Court finds that approval of the **PARTIAL** settlement is in the best interest of the plaintiffs.

8. Plaintiffs' counsel are waiving attorneys' fees regarding this **PARTIAL** settlement and not asking that any part of this **PARTIAL** settlement be set aside for case expenses. The entirety of this **PARTIAL** settlement is intended to go to the mother and father of decedent Robert White.

9. It is further found that the releases are in due order and proper form.

**IT IS THEREFORE ORDERED, ADJUDGED AND DECREED:**

- (a) That plaintiffs Denise White and Mark Randall Draper are the only persons entitled to share in the proceeds of this **PARTIAL** settlement;
- (b) That the **PARTIAL** settlement entered into by the parties is approved by the Court;
- (d) That plaintiffs
  - (1) Collect and receipt for the payment to be made at **PARTIAL** settlement as set forth herein.
  - (2) Do NOT need to pay any money to their attorneys since both attorneys have waived fees and expenses in favor of the entire **PARTIAL** settlement going to Robert Allen White's biological mother and biological father.
  - (3) Acknowledge satisfaction for the **PARTIAL** judgment and costs.
  - (4) Report and account therefore to the Court.
- (e) The proposed contracts of **PARTIAL** settlement having been approved by the Court, defendants Downtown Kansas City Community Improvement District, and The Downtown Council d/b/a The Downtown Council of Kansas City shall be and hereby are forever discharged of and from all liability for the injuries and death of Robert Allen White Daniel, and the claims against those two defendants ONLY are hereby dismissed with prejudice. The **PARTIAL** settlement referenced hereinabove relates to the overall case against all named defendants. However, this is a full and complete settlement as to the two parties being released.
- (f) All parties will bear their own respective costs.

**IT IS SO ORDERED.**

Date December 28, 2021  
Kansas City, Missouri

**S/ FERNANDO J. GAITAN, JR.**  
Fernando J. Gaitan, Jr.  
United States District Judge